

The EDS logo consists of the letters "EDS" in a bold, italicized, sans-serif font, white in color, set against a solid black rectangular background.

April 21, 1999

Mr. Jonathan Menes
Director, OTEA and
Co-chair, APEC Electronic Commerce Steering Group
U.S. Department of Commerce, HCHB 2815
Washington, DC 20230

Dear Jon,

EDS appreciates the opportunity to respond to the Federal Register Notice 99-8425, requesting comments on the APEC Electronic Commerce Steering Group work program.

EDS supports the Steering Group's work program as outlined in the "Blueprint for Action," although we are waiting to see how specific initiatives are to be implemented. In particular, we enthusiastically endorse the APEC-wide development of a "Paperless Trading" system. It should be noted that the work EDS has done in Hong Kong, as part of the CargoNet/Arena consortium, can serve as a model for such work.

EDS was particularly pleased to note the Ministers' recognition of the private sector's role in the development of electronic commerce. If its work is to be truly effective in promoting electronic commerce throughout the region, the Steering Group must fully involve and integrate the private sector; for industry to be less-than-full partners in this exercise is to limit its effectiveness from the start.

Furthermore, EDS would also like to point out that the high cost of telecommunications leased lines and other telecommunications services remains a significant factor limiting the development of electronic commerce throughout much of the APEC region. Until economies' telecommunications markets are truly open and competitive, the true potential of electronic commerce cannot be realized.

As you know, EDS is a global information services company with over 120,000 employees in 47 countries. The Electronic Business unit of EDS is focused on moving EDS customers into the global digital economy and helping to transform their business processes. This organization applies an array of electronic business technologies to enable companies to create and fulfill demand, and performs the Internet computing to support these activities. Service offerings range from digital supply chain management to legacy transformation services.

Thank you for this opportunity to comment. EDS looks forward to supporting the APEC Electronic Commerce Steering Group. Please do not hesitate to contact me at (202) 637-6721 if you have any questions or concerns.

Sincerely,

/s/

Heidi Hijikata
Director, Asia Pacific Policy and Government Affairs